

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

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UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 2:12-CR-043-CEA
	§	ECF
SHANICE ADEL LAMBERT (1)	§	“Referred to the U.S. Magistrate Judge”

**GOVERNMENT’S MOTION FOR DISCOVERY**

THE HONORABLE MAGISTRATE JUDGE OF SAID COURT:

Pursuant to Federal Rules of Criminal Procedure Rules 16(b) and 26.2, and following request by the defendant of disclosure under Rule 16(a)(1)(E) and compliance by the government, the United States of America respectfully moves the Court for an Order requiring the defendant in this cause and his attorney to comply with Rule 16(b) and (c), and Rule 26.2.

Respectfully submitted,

SARAH R. SALDAÑA  
United States Attorney

/s/Steven M. Sucsy

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**CERTIFICATE OF CONFERENCE**

I certify I conferred with the attorney for the defendant, who advised they agree in part and oppose in part with the foregoing motion.

/s/Steven M. Sucsy  
STEVEN M. SUCSY  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2012, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic filing” to counsel for Defendant, who has consented in writing to accept this Notice as service of this document by electronic means.

/s/Steven M. Sucsy  
STEVEN M. SUCSY  
ASSISTANT UNITED STATES ATTORNEY